

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>JOSEPH SIMMONS,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>Civil Action</b>
	:	<b>No. 22-1644</b>
	:	
<b>CITY OF PHILADELPHIA, et al.,</b>	:	
<b>Defendants.</b>	:	

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**JOINT SUBMISSION OF THE PARTIES**  
**PURSUANT TO THE COURT’S November 15<sup>th</sup> ORDER**

- 1. Status of Discovery:** The parties continue to exchange discovery. Defendants have agreed to provide the Plaintiff with ESI discovery based on a narrowed set of requests and negotiated search terms.
- 2. Depositions:** The Plaintiff’s deposition was conducted on January 8, 2025. The parties have scheduled depositions of Defendants to take place February 11-13. Plaintiff has requested that counsel for the Defendants set aside additional dates for discovery in February and March.
- 3. Outstanding discovery:** ESI is expected to be completed by the end of February 2025 and will be provided on a rolling basis. Plaintiff submitted a second set of discovery requests on January 29, 2025.

Date: February 3, 2025

Respectfully submitted,

/s/ Nia Holston  
Nia Holston, Esquire  
Attorney for Plaintiffs

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KATHRYN FARIS  
Senior Attorney  
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